

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

United States of America,

Plaintiff,

vs.

Tracy Griffith, Sr. and Shonell Griffith,

Defendants.

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Government Collection

Civil Action _____
(CDCS: 2024A52285)

Complaint

1. *Jurisdiction.* The district court has jurisdiction because the United States is a party. *See* U.S. CONST., art III, § 2, and 28 U.S.C. § 1345.
2. *Venue.* The defendants reside in Harris County, Texas, and may be served with process at 606 Arcadian Dr., Crosby, Texas 77532.
3. *The Debt.* The debt owed to the United States arose through a promissory note from the U.S. Small Business Administration, see Exhibit A. The debt on the date of the Certificate of Indebtedness, Exhibit B was:

A.	Current principal	\$	19,600.00
B.	Interest (capitalized and accrued)	\$	1,301.22
C.	Administrative fees, costs, penalties (Including \$405.00 Filing fee)	\$	7,946.68
D.	Balance due	\$	<u>28,847.90</u>
E.	Prejudgment interest accrues at 3.30% per annum being \$1.77 per day.		

- F. The current principal in paragraph 3 A is after credits of \$2,500.00.
4. *Default.* The United States has demanded that the defendant pay the indebtedness, and the defendant has failed to pay it.
5. *Prayer.* The United States prays for judgment for:
- A. The sums in paragraph 3, pre-judgment interest, administrative costs and post-judgment interest; and
- B. Other relief the court deems proper.

Respectfully submitted,

CERSONSKY & MCANELLY, P.C.

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